



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Janica Kyriacopoulos, Treasurer  
AmeriPAC: The Fund for a Greater America  
P.O. Box 696  
Annadale, VA 22003

APR 10 2002

Identification Number: C00271338

Reference: Amended 12 Day Pre-Special General (1/1/01-5/30/01), dated 7/19/01, 30 Day Post-Special (5/31/01-7/9/01), 30 Day Post-Special (7/10/01-11/5/01) and Year End (11/6/01-12/31/01) Reports

Dear Ms. Kyriacopoulos:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Each separate segregated fund and non-connected committee utilizing separate federal and non-federal accounts is required to allocate any administrative expenses between the accounts in proportion to the FUNDS EXPENDED METHOD derived from FEC Schedule H1. A Schedule H1 must be filed with the first FEC FORM 3X filed at the beginning of each two-year election cycle. 11 CFR §106.6(c)

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during